

From: [Jennifer Gaines](#)
To: Gaines.jennifer@epa.gov
Subject: Fw: ASSESSMENT
Date: 06/06/2012 07:43 AM

Jennifer Gaines
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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 06/06/2012 07:38 AM -----

From: Laura Parsons/DC/USEPA/US
To: "David P. GRIFFITHS" <dgriffiths@arquim.com.ar>
Cc: Russell Wasem/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA
Date: 07/31/2009 12:02 PM
Subject: RE: ASSESSMENT

Mr Griffiths,

Our mitigation requirements published in May, 2008 are final, but EPA has given a timeline of up to June 2011 for manufacturers to sell under the old labels in order to provide time for the considerable changes that we are requiring for the products. In most cases, our manufacturers who sell to individual consumers are completely changing their products including switching active ingredients and changing formulations.

We have prohibited the sales of more toxic anti-coagulants on the homeowner market, but are still allowing warfarin to be sold in the homeowner market. We are not allowing loose (pellet or meal) baits for the homeowner market since rodents move pellets and children can shake pellets out of bait stations. We are requiring bait stations to be used with the products.

We have not prohibited the use of grains, but we are requiring that the grains be pressed into a solid block.

I am not sure what kind of argument you could put forward, but perhaps this information provided above will help you.

Best regards,
Laura Parsons
Office of Pesticide Programs

▼ "David P. GRIFFITHS" ---07/28/2009 02:14:34 PM---Dear Laura, Thankyou for

your prompt reply.

From: "David P. GRIFFITHS" <dgriffiths@arquim.com.ar>
To: Laura Parsons/DC/USEPA/US@EPA
Date: 07/28/2009 02:14 PM
Subject: RE: ASSESMENT

Dear Laura,
Thankyou for your prompt reply.
I have a small rat poison company in Argentina.I sell 150tons a
year of rat
poison,manufactured with wheat grains and warfrin. We are the
number one in
sales for home use.
The Health Secretary,out of the blue,with no previous warning
nor
consultation,has prohibited the sale in grains,giving us 180
days.
I looked you up in EPA.
In the USA I read that there was a similar project,which "would
ban the sale
in grains.."as from the year 2011.
Is this a proyect or its already in force?
Do you consider warafrin safer than 2nd generation
anticoagulants?
With your great experience what argument can I use to obtain a
postpoment.six months is much to short.

-----Mensaje original-----
De: Parsons.Laura@epamail.epa.gov
[mailto:Parsons.Laura@epamail.epa.gov]
Enviado el: Martes, 28 de Julio de 2009 03:00 p.m.
Para: David P. GRIFFITHS
Asunto: Re: ASSESMENT

David,

Yes, I received this message.

Laura Parsons

From: "David P. GRIFFITHS" <dgriffiths@arquim.com.ar>

To: Laura Parsons/DC/USEPA/US@EPA

Date: 07/28/2009 12:11 PM

Subject: ASSESMENT

Hello Laura,
I would like to ask you something regarding rat poison.